

Representation – Modification UNC 0634 (Urgent)

Revised estimation process for DM sites with D-7 zero consumption

Responses invited by: **5pm on 03 November 2017**

To: enquiries@gasgovernance.co.uk

Representative:	Andrew Green
Organisation:	Total Gas & Power Ltd
Date of Representation:	03 rd November 2017
Support or oppose implementation?	Oppose
Relevant Objective:	None

Reason for support/opposition: Please summarise (in one paragraph) the key reason(s)

TGP supports initiatives to resolve high levels of UIG and volatility but does not believe this modification will do that. It seeks to address a temporary issue that can be resolved better by addressing the root causes and more worryingly has longer term negative consequences. Historically the D-7 estimate has worked well and the transitional DM zero issue is temporary and when resolved will cease to be an issue and therefore will not need this modification to be implemented. TGP does not support AQ/365 as this does not reflect seasonality or day of use patterns which are more likely to be accurate on an enduring basis, as they have been in the past.

Implementation: *What lead-time do you wish to see prior to implementation and why?*

TGP does not support this proposal

Impacts and Costs: *What analysis, development and ongoing costs would you face?*

TGP has not been able to determine costs as the modification is urgent status

Legal Text: *Are you satisfied that the legal text will deliver the intent of the Solution?*

The legal text has not been reviewed

Are there any errors or omissions in this Modification that you think should be taken into account? *Include details of any impacts/costs to your organisation that are directly related to this.*

No

Please provide below any additional analysis or information to support your representation

Urgent status has meant we have not had the opportunity to conduct further analysis